

**REMARKS**

**I. Formalities**

Applicants note that the Examiner did not indicate whether the Formal Drawings filed on August 10, 2001 are accepted, as requested in Applicants' Amendment filed on September 22, 2003. Thus, Applicants respectfully request that the Examiner acknowledge and approve the aforementioned Formal Drawings.

**II. Status of the Application**

By the present amendment, claims 2-7 have been amended and claims 8-23 are hereby added to more fully cover various implementations of the invention. Claims 2-23 are all the claims pending in the Application, with claims 2-3, 8, and 16 being in independent form. Claims 2-7 have been rejected.

**III. Claim Rejections under 35 U.S.C. §103**

As an initial matter, Applicants note that in the Final Office Action dated November 26, 2003, the Examiner failed to specify any grounds of rejection with respect to claim 7. Therefore, according to the most plausible interpretation of the Office Action, the Examiner has rejected claims 2-7 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Published Application No. 2001/0013843 to Fujiwara *et al.* (hereinafter "Fujiwara") in view of U.S. Patent No. 5,823,784 to Lane (hereinafter "Lane"). Applicants respectfully traverse this rejection for *at least* the reasons stated below.

In order for the Examiner to maintain a rejection under 35 U.S.C. §103, Fujiwara, Lane, or some combination thereof, must teach all of the limitations of claims 2-7. Applicants

respectfully submit that neither Fujiwara, Lane, nor any combination thereof, teaches or suggests all of the limitations of claims 2-7.

**A. Independent Claim 2**

Independent claim 2 recites:

said master display unit, equipped with a generation unit configured to generate a first basic picture and an on-screen picture that is overwritten on said first basic picture; and

said slave display unit, equipped with an erasure unit configured to erase a portion of a second basic picture... in a display region corresponding to said on-screen picture...

With respect to independent claim 2, the Examiner acknowledges that Fujiwara fails to teach or suggest a slave display unit, equipped with an erasure unit, as recited in Applicants' claim 2. Applicants agree with the Examiner that Fujiwara does not teach or suggest this feature.

Nevertheless, the grounds of rejection apply Lane, alleging that the LCD projector 16, together with the solid state shutter 20, as taught in Lane, correspond to a slave display unit, equipped with an erasure unit, as required by claim 2. Additionally, the grounds of rejection allege that one of ordinary skill would have been motivated to modify Fujiwara with Lane because this would allow a user to have the ability to mask an unwanted portion of the image not to be seen by others. Applicants respectfully disagree with the grounds of rejection, and submit the neither Fujiwara, Lane, nor any combination thereof, teaches or suggests a slave display unit, equipped with an erasure unit configured to erase a portion of a second basic picture in a display region corresponding to an on-screen picture, as required by Applicants' claim 2. Indeed, as

recited in claim 2, the display region that is erased corresponds to an on-screen picture that is overwritten on a first basic picture that are, in turn, generated by a master display unit.

In contrast to the requirements of claim 2, Lane teaches a fire-fighting simulator that includes a slide projector 14, which projects an image of the object on fire on the screen 34, and an LCD projector 16, which superimposes an image of a fire. *See* column 4, lines 10-12. Specifically, Lane teaches that as a student attempts to ‘fight’ the fire displayed on the screen 34 by discharging the extinguisher 40, the student directs an infra-red beam (representing a stream of extinguishing agent) at the screen 34, and detectors 36 detect the impingement of the infra-red beam. *See* column 4, lines 17-20. Accordingly, Lane teaches that the controller 32 then determines the simulated effect of the impingement of the student-directed beam (representing a stream of extinguishing agent) on the fire and closes the appropriate shutters 20 to provide an accurate simulation of the result obtained from the discharge of the extinguisher 40. *See* column 4, lines 22-25.

Hence, Lane does not teach that either the LCD projector 16 or the solid state shutter 20 is equipped with an erasure unit configured to erase a portion of the image projected by LCD projector 16 in a display region corresponding to an on-screen picture, as required by Applicants’ claim 2. In fact, Lane teaches completely the opposite—that the appropriate shutters 20 are configured to close, and thereby obliterate portions of the image projected by LCD projector 16 in a plurality of distinct display regions in response to a student-directed infra-red beam, and the subsequent determination made by controller 32 as to what accurately simulates the result

obtained, if any, from the student-directed beam (representing a stream of extinguishing agent) on the fire.

That is, Lane clearly teaches obliterating portions of the image projected by LCD projector 16 in a display region that corresponds to an area that is manually selected by a user (i.e., by the student directing the infra-red beam to a particular area of the screen 34). In contrast, claim 2 requires, *inter alia*, erasing a portion of a picture in a display region corresponding to an on-screen picture generated by a master display unit. Therefore, because Lane teaches obliterating portions of an image in a display region that corresponds to an area that is manually selected by a user with an infra-red beam, Lane does not teach, and is incapable of suggesting, erasing a portion of a second basic picture in a display region corresponding to an on-screen picture (wherein the on-screen picture is overwritten on a first basic picture generated by a master display unit), as required by Applicants' claim 2.

Indeed, Applicant respectfully submits that even if one of ordinary skill in the art were to combine the teachings of Fujiwara and Lane, one could not possibly arrive at the present invention. To the contrary, the combination of Fujiwara and Lane would result in a plurality of display devices wherein user intervention would be required with respect to each device for the user to manually select—with an infra-red beam—portions of the image projected by each LCD projector 16 that the user wants to be obliterated. In contradistinction, claim 2 recites erasing a portion of a picture in a display region corresponding to an on-screen picture that is generated by a master display unit and, hence, no manual selection of the specific display region to be erased is required.

Thus, Applicants respectfully submit that independent claim 2 is patentable over Fujiwara, Lane, and any combination thereof, for *at least* the reasons mentioned above. Further, Applicants also submit that dependent claim 6 is allowable, *at least* by virtue of its dependency on claim 2.

Thus, Applicants respectfully request that the Examiner withdraw this rejection.

**B. Independent Claim 3**

In view of the similarity between the recitations set forth in claim 3 and the recitations discussed above with respect to independent claim 2, Applicants respectfully submit that the foregoing arguments as to the patentability of independent claim 2 apply by at least analogy to independent claim 3. As such, Applicants respectfully submit that claim 3 is patentably distinguishable over Fujiwara, Lane, and any combination thereof, for *at least* these reasons. Further, Applicants submit that the dependent claims 4-5 and 7 are allowable *at least* by virtue of their dependency on claim 3. Accordingly, Applicants respectfully request that the Examiner withdraw this rejection.

**IV. New Claims**

Claims 8-23 are hereby added. Claims 8-23 are fully supported *at least* by page 6, line 22 – page 7, line 10 of the instant Application.

In view of the similarity between the recitations set forth in independent claims 8 and 16 and the recitations discussed above with respect to independent claim 2, Applicants respectfully submit that the foregoing arguments as to the patentability of independent claim 2 apply by at least analogy to claims 8 and 16. Thus, Applicants submit that claims 8 and 16 are allowable *at*


*least* these reasons. Further, Applicants submit that the dependent claims 9-15 and 17-23 are allowable *at least* by virtue of their dependency on claims 8 and 16, respectively.

**V. Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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